

DARRYL L. JONES

ATTORNEY AT LAW

109 W. 6TH AVE., SUITE 200 • ANCHORAGE, ALASKA 99501
(907) 278-1212 • FAX (907) 278-1213

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

SALLY C. PURSER.

Plaintiff,

12

JOSEF F. BOEHM, ALLEN K.

BOLLING and BAMBI TYREE

Defendant.

Case No. 3:05-cv-00085-JKS

PLAINTIFF'S THIRD SET OF DISCOVERY REQUESTS

Pursuant to FEDERAL R. CIV. P. 26 and 33, the Plaintiff requests that the Defendant Boehm answer the attached interrogatories in writing and under oath within thirty (30) days from the date of service. Pursuant to FEDERAL R. CIV. P. 26 you are requested to supplement your answers if you become aware that those answers are incorrect, misleading or incomplete.

DEFINITIONS

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

EXHIBIT 8
Page 1 of 23

A. Person: The term "person" includes a corporation, partnership, other business association or entity, a natural person, and any government or government body, commission, board, or agency.

B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all handwritten, typed or printed material, photographs, copies of all the foregoing, and material stored on tape or any other magnetic medium.

C. Identification of Documents: When you are requested to "identify" a document, you are requested to provide the following with regard to each document:

(1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena duces tecum for the document;

(2) The name, business address, residence address, telephone number, and occupation of the present custodian of the document;

(3) The date on which such document was first prepared; and,

(4) The name, business address, residence address, telephone number, and occupation of each person who prepared or signed the document.

D. Identification of Natural Person: When you are requested to "identify" a natural person, you are requested to provide the following with regard to each such person:

(1) The name of the person;

(2) The business address of the person;

(3) The residence address of the person;

EXHIBIT

Page 2 of 23

- (4) The business telephone number of the person;
- (5) The residence telephone number of the person;
- (6) The occupation of the person and the name of the employer of the person, if any.

F. Identification of Business Entity: When you are requested to "identify" any corporation, partnership, joint venture or other business entity, you are requested to provide the following with regard to each such entity:

(1) Whether the entity is a corporation, partnership, joint venture, or other type of entity;

(2) If the entity is a partnership or joint venture:

- (i) identify each partner or joint venturer;
- (ii) state whether he or she is a limited or general partner; and,
- (iii) specify the date on which the partnership or joint venture was formed;

(3) If the entity is a corporation:

- (i) identify each of the current officers of the corporation;
- (ii) state the date of incorporation;
- (iii) state the State in which the corporation is incorporated

L. RRYL L. JONES
ATTORNEY AT LAW
109 W 6TH AVENUE, SUITE 200
ANN ARBOR, MI 48106-1500
TEL: 734.769.1212 FAX: 734.769.1213

EXHIBIT 8
Page 3 of 23

INTERROGATORIES

INTERROGATORY NO. 1: If you have received any inheritances, including any life insurance proceeds or lawsuit settlements or annuities in the last five years. List the type and value of the inheritance lawsuit settlements or insurance proceeds received in the last five years; the approximate date such was received and what it was used for, if anything.

ANSWER:

INTERROGATORY NO. 2: Please state in detail, your involvement and percent of ownership in an Alaska Limited Liability Corporation known as JEB, LLC. In responding to this interrogatory, state whether you know any of the following individuals, how you first met that individual, when you first met that individual, the relationship you have with that individual (e.g., friend, business

D. RRYLL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
Tel: 907.261.1111 Fax: 907.261.1112

EXHIBIT 8
Page 4 of 23

associate, etc.), and whether you have communicated with that individual within the last year.

- a. Bruce Burnett
- b. Eric Harstad

ANSWER:

DARRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
Tel: 207 235 2122 Fax: 207 235 2123

EXHIBIT 8
Page 5 of 23

INTERROGATORY NO. 3: Please state whether you know any of the following individuals, how you first met that individual, when you first met that individual, the relationship you have with that individual (e.g., friend, business associate, etc.), and whether you have communicated with that individual within the last year.

- a. Terry D. Shurtleff.
- b. Ron Bagley.
- c. Corey Grubb.
- d. Mike Kangas.

ANSWER:

INTERROGATORY NO. 4: Please state with detailed specificity your involvement in the case of AHJ Acquisition Corp. LLC v. Alaska Indus. Hardware, Inc., 306 F. Supp. 2d 455, 2004 U.S. Dist. LEXIS 3195 (S.D.N.Y., 2004). Include in your response, the status of the case, an explanation of all orders in the case, and if the case has been litigated to final judgment, explain the result reached and reasoning therefore.

ANSWER:

LARRY L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE: 281.1111 FAX: 281.1111

EXHIBIT 8
Page 6 of 23

INTERROGATORY NO. 5: Please state with detailed specificity whether you know an individual by the name of Cathie Prindle. In answering this interrogatory, state the approximate date that you first met Cathie, how you first met her, how old she was when you met her, and explain in detail your involvement with her.

ANSWER:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce the last **FIVE** years of the Internal Revenue Tax return documents you filed on behalf of yourself personally.

REQUEST FOR PRODUCTION NO. 2:

Please produce the name, address and phone number, including but not limited to, each and every person, company or corporation that assisted you with the preparation of your personal IRS tax returns for the last five years.

REQUEST FOR PRODUCTION NO. 3:

Please produce including but not limited to, any Personal State tax returns filed in Alaska or any other State in the United States for the last five years.

DARRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PHONE: 283-7777 FAX: 283-2812

REQUEST FOR PRODUCTION NO. 4:

Please produce the name, address and phone number, including but not limited to, for each and every tax person that assisted you with the preparation of any Personal State tax returns for the last five years.

REQUEST FOR PRODUCTION NO. 5:

Please produce the name, address and phone number for, including but not limited to, any bank, savings and loan, holding facility, on or off shore accounts, stock accounts, that you have had or currently have in the last five years.

REQUEST FOR PRODUCTION NO. 6:

Please produce including but not limited to the names, addresses and phone numbers of any and all business partner that you have conducted business with in the last five years in the business known as Alaska Industrial Hardware, doing business as AIH or Alaska Industrial Hardware Inc.

REQUEST FOR PRODUCTION NO. 7:

Please produce including but not limited to the names, addresses and phone numbers of all or any business partner that you have conducted business with during the last five years in any businesses outside the State of Alaska.

L. RRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL: (907) 261-1111 FAX: (907) 261-1114

REQUEST FOR PRODUCTION NO. 8:

Please produce including but not limited to the names, addresses and phone numbers of any and all business partner or partners that you have conducted business with during the past five years in any business in Anchorage, Alaska known as TGI Friday.

REQUEST FOR PRODUCTION NO. 9:

Please produce including but limited to all or any notes you are holding whereas any party or any third parties that owe you money for loans, debts, business holdings or property you have sold to them in the last five years

REQUEST FOR PRODUCTION NO. 10:

Please produce including but limited to the names, address and phone numbers for any financial institution or collections agency that collects money from any parties on your behalf for the last five years.

REQUEST FOR PRODUCTION NO. 11:

Please list all assets you have sold, given away or transferred to any parties since you have been charged in the Federal case involving Sally Purser.

RYRL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL: (907) 278-1212 FAX: (907) 278-2133

EXHIBIT 8
Page 9 of 23

REQUEST FOR PRODUCTION NO. 12:

Please identify the parties that you have given, transferred or sold any assets to since you were charged in the Federal case involving Sally Purser. Please provide their name, address and phone number.

ADMISSIONS:

1. Please admit that you own fifty percent (50%) or more of Alaska Industrial Hardware Store located within Alaska or it's Corporation.

ANSWER:

2. Please admit that you own some percentage of Alaska Industrial Hardware located within Alaska or its Corporation and state what that percentage you have owned for the last five years, year by year

ANSWER:

RYLL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL (907) 278-3712 FAX (907) 278-1213

EXHIBIT 8
Page 10 of 23

3. Please admit that since the time you were charged in the Federal Criminal proceedings involving Sally Purser and other minor children you have not hid, transferred, sold or given away any assets to protect them from being attached by Sally Purser.

ANSWER:

4. Please admit that you entered into a plea agreement with the United States Government with regard to the Federal case involving Sally Purser.

ANSWER:

5. Please admit that you own some percentage of ownership in businesses outside the State of Alaska and identify the interest.

ANSWER:

RYRL L. JONES

ATTORNEY AT LAW

109 W. 6TH AVENUE, SUITE 200

ANCHORAGE, ALASKA 99501

PH (907) 276-1212 FAX (907) 276-1213

EXHIBIT 8
Page 11 of 23

6. Please admit that you have filed all the required income taxes with the Internal Revenue Service in the last five years, for yourself personally and all or any businesses you are required to do so.

ANSWER:

7. Please admit that you have filed all the required Corporation tax documents with the State of Alaska in the last five years for any and all businesses you are affiliated with.

ANSWER:

8. Please admit that you filed all the required tax documents in any other State of the United States in which you are required to do so, for yourself personally on behalf of any and all businesses you are affiliated with, for the last five years

ANSWER:

J. RRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL: (907) 278-1212 FAX: (907) 278-1213

9. Please admit you purchased crack cocaine from Leslie Williams.

ANSWER:

10. Please admit you purchased crack cocaine from Allen Bolling.

ANSWER:

11. Please admit you purchased crack cocaine from Jay Whaley.

ANSWER:

12. Please admit you provided illegal drugs to Salley Purser in return for sexual favors being performed on you.

ANSWER:

13. Please admit that you had sexual relations with Salley Purser when she was only fifteen years old.

ANSWER:

14. Please admit you had under age girls perform sexual acts on each other while you gratified yourself watching.

ANSWER:

ARRYLL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PH (907) 278-1212 FAX (907) 278-1213

EXHIBIT 8
Page 13 of 23

15. Please admit you utilized what you called an "A" Tool which was used as a sexual device on Salley Purser.

ANSWER:

16. Please admit that you provided crack cocaine to F.A., an underage girl, demanding sexual favors in return from her.

ANSWER:

17. Please admit that you had Salley Purser perform oral sex on you in the bathrooms at Alaska Industrial Hardware facility.

ANSWER:

18. Please admit that you directed Salley Purser pick up cash from Alaska Industrial Hardware and bring you the money back so you could purchase illegal drugs.

ANSWER:

EXHIBIT 8
Page 14 of 23

RYRL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PH (907) 278-1212 FAX (907) 278-1213

19. Please admit that you had oral sex and intercourse with Salley Purser at various hotels in Anchorage, Alaska.

ANSWER:

20. Please admit that you arranged transportation and living money for Salley Purser to leave Alaska in order to keep her from talking to the local and federal authorities.

ANSWER:

21. Please admit you had Leslie Williams accompany Salley Purser to Seattle at your expense.

ANSWER:

.RRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PH (907) 278-1212 FAX (907) 278-1213

EXHIBIT 8
Page 15 of 23

22. Please admit that you would entertain young girls at your residence, your condo, and your trailer and have sex with them.

ANSWER:

22. Please admit that you had sexual relations with Salley Purser in the trailer by your residence.

ANSWER:

23. Please admit that you had pictures taken of Salley Purser with no clothes on.

ANSWER:

J. RRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
PH (907) 278-1212 FAX (907) 278-1214

24. Please admit that you had pictures taken of the young girls while you were having sex with them.

ANSWER:

25. Please admit that you caused Salley Purser to become dependent on crack cocaine

ANSWER:

26. Please admit that you furnished crack cocaine to Salley Purser in exchange for sexual favors to be performed on you as well as some of your male friends.

ANSWER:

27. Please admit that you withheld crack cocaine from Salley Purser until she performed sexual favors on you as well as you on her

ANSWER:

RYRL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL 907/278-1212 FAX 907/278-1213

EXHIBIT 8
Page 17 of 23

28. Please admit you had Salley Purser perform sexual acts on Bambi Tyree and "Brenda" while you watched and masturbated to gratification.

ANSWER:

29. Please admit that you had knowledge of Salley Purser's age when you first had sex with her.

ANSWER:

30. Please admit that you had knowledge of Bambi Tyree's age when you first supplied her crack cocaine.

ANSWER:

ARRYLL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL (907) 278-1212 FAX (907) 278-1213

EXHIBIT 8
Page 18 of 23

31. Please admit that you knew Bambi Tyree's age when you first had sex with her.

ANSWER:

32. Please admit that you would provide crack cocaine for Salley Purser and keep her high for days on end.

ANSWER:

33. Please admit that you would provide crack cocaine for Salley Purser until she would pass out.

ANSWER:

34. Please admit that you had sexual relations with Salley Purser when she was incoherent and incapacitated

ANSWER:

ARRYLL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL: (907) 278-1212 FAX: (907) 278-1213

EXHIBIT 8
Page 19 of 23

35. Please admit that it was your practice to use illegal drugs on young girls to satisfy your sexual appetite.

ANSWER:

36. Please admit that you punched Salley Purser in the face in front of Bambi Tyree.

ANSWER:

37. Please admit that Salley Purser suffered from two seizures in your home and you refused to allow Bambi Tyree call 911 for assistance.

ANSWER:

38. Please admit that you told Bambi Tyree, do not call 911 for fear the police would respond to your home and discover illegal activity.

ANSWER:

ARRY L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
Ph: (907) 278-1212 FAX: (907) 278-1213

EXHIBIT 8
Page 20 of 23

39. Please admit your residence was equipped with a security alert system allowed you to know if a person was entering or leaving the dwelling when the system was activated.

ANSWER:

40. Please admit that you are part owner in TGIFridays restaurant in Anchorage, Alaska.

ANSWER:

41. Please admit that the initial "SP" that is utilized in the criminal case against you is in fact Sally Purser.

ANSWER:

42. Please admit that you have not attempted to file for bankruptcy since Salley Purser filed a civil complaint against you with regard to 3:05-cv-00085 JKS.

ANSWER:


43. Please admit that you were arrested for Mies-4, delivery poss w intent IVA, VA in violation of AS 11.71.040 (a) (1) in July of 1991.

EXHIBIT 8
Page 21 of 23

DATED at Anchorage, Alaska, this 27th day of November, 2006.

LAW OFFICE OF DARRYL L. JONES

Attorney for Plaintiff, Salley Purser

By: 

Darryl L. Jones, Esq.

ABA # 8811188

DARRYL L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
Tel 907/2781212 FAX 907/2781213

EXHIBIT 8
Page 22 of 23

VERIFICATION

STATE OF CALIFORNIA)

ss.

JUDICIAL DISTRICT)

I affirm under oath that the above answers to interrogatories are true to the best of my present recollection and belief.

JOSEF BOEHM

SUBSCRIBED AND SWORN to before me this _____ day

of _____ 2006, at _____, California.

Notary Public in and for the State of California

My Commission Expires: _____

MARY L. JONES
ATTORNEY AT LAW
109 W. 6TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
Ph (907) 278-1212 Fax (907) 278-1213

EXHIBIT 8

Page 23 of 23